

Arizona Public Service Co. Comments for NERC TADS Phase II

*1. If you are a Transmission Owner, do you currently collect Non-Automatic transmission outage data similar to Phase II TADS? If “yes,” please explain.*

*Yes, we collect the data on selected voltage class and it is in different format than NERC TADS Phase II.*

*2. Is the data being requested reasonable and obtainable? See Sections 2 and 3 of the Phase II Report. If “no,” please explain.*

The other similar transmission outage data collection efforts have not recorded planned outage data; SGS, EPRI, WECC TRD and MAIN, only ECAR has collected this data.

- Per ECAR, even though this data was collected for more than 20 years, ECAR did not alter, change or recommend any system changes due to conclusions derived from this data, i.e., they did nothing with the scheduled outage data.

The estimate is that the volume of data to collect for planned outages is 5 to 7 times the amount of data for automatic outages. This volume of data can be extremely large. The automatic outages were collected for WECC in 2006, the number of 200kV circuit and transformers, TADS elements, outages collected was approximately 1,600 outages. Therefore, the number of scheduled outages will be in the range of 8,000 to 11,200 outages for WECC alone. This amount of data collection is onerous to the Region.

*3. Planned Outages have a 30-minute outage exclusion that is stated as follows: “Outages of TADS Elements of 30 minutes or less duration resulting from switching steps or sequences that are performed in preparation or restoration of an outage of another TADS Element are not reportable.”*

*Please comment on the appropriateness of this exclusion. While the 30-minute exclusion will reduce the number of reported outages, should all outage times be recorded in order to determine which outages can be excluded based upon the 30-minute limit? Should a TO’s supporting data for determining exclusions be part of NERC’s data review? Does the 30-minute exclusion reduce the reporting burden or does it increase it? Please explain your response.*

*This is a reasonable exclusion time, do not remove.*

*4. Are the metrics appropriate? See Section 4 the Phase II Report. If “no,” please explain.*

How will the scheduled outage data be used as a feedback mechanism for improvement of system performance?

The attributes of the circuits and transformers are not known so conclusions cannot be drawn to determine which ‘type’ of an element are requiring more

scheduled outages than other ‘types’ of elements. This could lead to false conclusion and actions.

*5. Are the data review process and the requirement that TOs maintain historical supporting information used to develop its TADS data for a five-year period reasonable to ensure the quality of TADS data? If “no,” please explain.*

This is an unreasonable request. Past years data is often incompatible with current data because of potential circuit definitions changes in each system and potential metric definition changes.

*6. Is the implementation schedule for Phase II TADS for 2009 reasonable? See Section 6 of the Phase II Report, Table 3. If “no,” please explain.*

During the time period in which DOE has allowed the Schedule 7 data collection to remain voluntary, that NERC and DOE work together to develop reasoning and worthwhile uses for the NERC wide collection of the scheduled outage data.

*7. Are there ambiguities in the Manual that need clarification? If “yes,” please explain.* No, the Manual is well written.

#### **General Comments:**

- There is concern of the WECC TOs that this data collection will result in another compliance medium.
- Scheduled outages are taken during a system condition which allows the outage, off-peak condition. It is unclear how this information will be used to enhance Planning Standards development.
- Do not understand how NERC will correlate system performance, i.e., automatic outages with scheduled outages. It may be done on a circuit to circuit basis, but NERC TADS data does not gather the attributes of the circuits to make a useful correlation.
- The NERC TADS members voted originally to not collect the scheduled outage data.
  - The original NERC TADS Phase I Report, dated March 7, 2007, listed reasons why the scheduled outage data should not be collected:
    - Planned outage data doesn’t capture live-line maintenance. Planned outages are subject to many Transmission Owner variables (weather, crew availability, and budgets) so true comparisons cannot be made.
    - Planned outages are only allowed when system conditions permit them and therefore do not jeopardize reliability.
    - Trending system unavailability has a potential negative unintended consequence. Since planned outages comprise the largest part of unavailability, a Transmission Owner could maximize system availability by (a) reducing planned outages, which could (b) increase forced outages but (c) meet a goal of increased availability. The EPRI Grid Reliability project found that planned outages were reported as less attainable through participant surveys than forced outages.